

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**FARAH JEAN FRANCOIS,**

**Case No.: 1:22-cv-4447-JSR**

**Plaintiff,**

**-against-**

**VICTORY AUTO GROUP LLC d/b/a  
VICTORY MITSUBISHI,  
SPARTAN AUTO GROUP LLC d/b/a  
VICTORY MITSUBISHI,  
STAVROS ORSARIS,  
YESSICA VALLEJO,  
DAVID PEREZ,  
DIANE ARGYROPOULOS, and  
PHILIP ARGYROPOULOS,**

**Defendants.**

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**DECLARATION OF AHMAD KESHAVARZ IN OPPOSITION TO DEFENDANTS  
MOTION FOR SUMMARY JUDGMENT:  
RE-FILED REDACTED EXHIBITS**

Pursuant to 28 U.S.C. § 1746, AHMAD KESHAVARZ declares under penalty of perjury that the foregoing is true and correct.

1. I am a member of the Bar of this Court and the principal for The Law Office of Ahmad Keshavarz for Plaintiff Farah Jean Francois (“Plaintiff”).

2. I make this Declaration in support of Plaintiff’s Opposition to the Defendants’ Motion for Summary Judgment [DE 49-52].

3. I make this Declaration for the purpose of presenting such documents to the Court for consideration in connection with the Opposition, and respectfully refer the Court to the accompanying Memorandum of Law and 56.1 Statement for Plaintiff’s factual and legal arguments.

4. Attached hereto as **Exhibit A** is a true and correct copy of the deposition transcript of Defendant David Perez. This document was previously filed as **DE 53-01**.

5. Attached hereto as **Exhibit B** is a true and correct copy of the deposition transcript of Defendant Yessica Vallejo. This document was previously filed as **DE 53-02**.

6. Attached hereto as **Exhibit H** is a true and correct copy of an agreement between Defendant Spartan Auto Group, LLC and Credit Bureau Connection (“CBC”) for the subscription of CBC’s service providing credit reports. This document was previously filed as **DE 53-08**.

7. Attached hereto as **Exhibit O** is a true and correct copy of the deposition transcript of Plaintiff Farah Jean Francois. This document was previously filed as **DE 53-17**.

8. Attached hereto as **Exhibit R** is a true and correct copy of the New York Department of Motor Vehicles Abstract for the Driver’s License of Farah Jean Francois. This document was not previously produced in discovery as the undersigned only received March 15, 2023 (please note the document’s date of March 15, 2023). This document was previously filed as **DE 53-20**.

9. Attached hereto as **Exhibit S** is a true and correct copy of the deposition transcript of Papito Momplaisir. This document was previously filed as **DE 53-21**.

10. Attached hereto as **Exhibit U** is a true and correct copy of the agreement between Defendant Spartan Auto Group, LLC and Capital One, N.A. This document was previously filed as **DE 53-23**.

11. Attached hereto as **Exhibit Z** is a true and correct copy of the deposition transcript of Jami Singer. This document was previously filed as **DE 53-28**.

12. Attached hereto as **Exhibit GG** is a true and correct copy of the TransUnion Credit Report for Farah Jean Francois obtained on September 2, 2021. This document was previously filed as **DE 53-36**.

13. Attached hereto as **Exhibit HH** is a true and correct copy of the Equifax Credit Report for Farah Jean Francois obtained on June 11, 2021. This document was previously filed as **DE 53-37**.

WHEREFORE, for the reasons set forth herein and in the accompanying Memorandum of Law, Plaintiff respectfully requests for the Court to deny Defendants' Motion for Summary Judgment.

Dated: Brooklyn, New York  
April 3, 2023

\_\_\_\_\_/s/\_\_\_\_\_  
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*Attorney for Plaintiffs*